

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

FOLLOW-UP INTERROGATORIES OF THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS DAVID E. WILLIAMS
(APWU/USPS-T1-49-55)
(March 13, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following follow-up interrogatories to United States Postal Service witness David E. Williams (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-49 In your response to APWU/USPS-T1-21 you confirmed Mr. Neri's description of LR 57 as being a list of 487 mail processing facilities in the Postal Service network as of September 15, 2011.

- a) Please confirm that the following facilities on the Postal Service's February 22, 2012 list of facilities that have been approved for consolidation do not appear in LR 57: 1) Alamogordo, NM CSMPC; 2) Albany, GA CSMPC; 3) Athens, GA P&DF; 4) Bloomington, IN P&DF; 5) Campton, KY CSMPC; 6) Clovis, NM CSMPC; 7) Farmington, NM CSMPC; 8) Jackson, TN P&DF; 9) Owensboro CSMPC, KY; 10) Quincy, IL P&DF; 11) Socorro, NM CSMPC; 12) Truth or Consequences, NM CSMPC; 13) Tucumcari, NM CSMPC; 14) Glens Falls, NY CSMPC; 15) Portage, WI CSMPC; 16) Poteau, OK CSMPC; 17) Valdosta, GA CSMPC; 18) Wareham MA CSMPC; and 19) Woodward, OK CSMPC.
- b) If you cannot confirm, please provide the number and name of the facility listed in LR 57 that matches to each of these facilities.
- c) Please confirm that these facilities were part of the mail processing network on September 15, 2011 and continue to be part of the mail processing network today.
- d) Please provide a list of any other active mail processing facilities that are missing from LR 57.

APWU/USPS-T1-50 In response to POIR 5, Q 9, the Postal Service provided the AMP studies for most of the facilities listed on the February 22nd list of facilities approved for consolidation (LR 73). Please confirm that the AMP study is the source of the correct information about which activities will be consolidated at each location (e.g. origin and destination, destination only, origin only).

APWU/USPS-T1-51 In response to POIR 5, Q 9, the Postal Service provided the AMP studies for most of the facilities listed on the February 22nd list of facilities approved for consolidation (LR 73). However, the Staten Island/Brooklyn consolidation of destinating mail does not appear in this filing. Will that be provided later?

APWU/USPS-T1-52 In response to POIR 5, Q 9, the Postal Service provided the AMP studies for most of the facilities listed on the February 22nd list of facilities approved for consolidation (LR 73). Please confirm that the savings estimated for the approved AMPs presented here is less than \$1 billion.

APWU/USPS-T1-53 In response to POIR 5, Q 9, the Postal Service provided the AMP studies for most of the facilities listed on the February 22nd list of facilities approved for consolidation (LR 73).

- a) A review of the summary pages of those AMP studies show that in more than 50 analyses the net number of management and supervisory employees is expected to increase once the consolidation takes place. Yet there are savings estimated in management and supervisory hours for most of these cases. Please explain the circumstances that cause both of these to be true. [As one example, Topeka KS consolidation into Kansas City, MO shows a net increase of 8 PCES/EAS employees yet expects a savings of over \$400,000 per year to be generated from this consolidation. While one notes that the table of employee counts on page 5 is labeled Provo/Grand Junction, the numbers themselves do not appear to match that pairing and therefore are assumed to pertain to the Topeka/Kansas City consolidation.]
- b) Please explain why it would be necessary to increase management/supervisory employees when most of the consolidations reduce workhours associated with craft employees.
- c) There are a handful of cases where, on net, the number of craft employees is expected to increase after the consolidation yet in most of those cases there is an expectation of craft workhour savings. Please explain the circumstances that cause both of these to be true. [Jackson, TN and Kinston, NC are two examples.]

APWU/USPS-T1-54 As of February 22, there were six facilities that were still being studied, when does the Postal Service anticipate making decisions about those six facilities?

APWU/USPS-T1-55 In LR 73, there are two different studies filed for the originating and destinating mail consolidation for Ft. Lauderdale P&DC, which appear to be evaluated for different but partially overlapping periods of time. What steps were followed to make sure that these two studies provide the same answer as a single study on the consolidation of O&D mail would have provided?